

January 18, 2017

Kim Gaedeke, Director  
Bureau of Professional Licensing  
Michigan Department of Licensing and Regulatory Affairs  
P.O. BOX 30670· LANSING, MICHIGAN 48909

cc: Michigan Board of Psychology

Dear Ms. Gaedeke:

We are the Directors of Clinical Training of all eight American Psychological Association-accredited doctoral clinical psychology programs in Michigan. Collectively, we graduate most of the psychologists who will be granted doctoral psychology licenses by the Board of Psychology.

We are writing to express our great concern about the policy described in your email of January 12, 2017 to those many people who hold the Masters Temporary Limited License in Psychology (TLLP) in Michigan. The email stated that the TLLP would last for only 18 months and would no longer be extended or renewed for additional periods.

This policy will cause substantial problems for our doctoral training programs and the many training sites affiliated with our programs.

As you know, the primary role of the TLLP has been to allow people who have a terminal master's degree in psychology to obtain the required 2,000 hours of supervised experience and to pass the Examination for Professional Practice in Psychology (EPPP) so that they can obtain the Master's LLP.

However, the Bureau may not recognize the need for licensure among trainees in doctoral programs. In our doctoral programs, students engage in practicum and internship training for two to five years, typically after receipt of the master's degree, but prior to completing the doctorate. Such training occurs in both program-based clinics and external community settings. Importantly, many of these training sites require our students to be licensed to provide services.

Over the past several decades, our students have applied for and obtained the TLLP to allow them to obtain this required clinical training, and the TLLP lasted for 2 years. Many students have renewed their TLLP for an additional 2-year period (and sometimes for four additional years) to continue their practicum and internship training

until they complete their doctorate. Fortunately, such renewal requests have been granted by the Board of Psychology to support our students' continued doctoral training.

One might contend that doctoral students should simply obtain the master's LLP during this training period. We disagree. As doctoral students, our trainees will, in a few years, seek and obtain licensure at the doctoral level. Given that our students are in continued full-time training after obtaining the master's degree (taking courses, conducting research, teaching, and engaging in practicum training), they are neither interested in nor able to engage in intensive supervised training for 2,000 hours as is required for those people who are seeking the LLP. Moreover, consistent with national standards, our doctoral programs expect our students to take the EPPP after receiving their doctorate and prior to full licensure. Thus, obtaining the master's LLP for our doctoral students during the latter years of their training is neither reasonable nor likely feasible.

We ask the Bureau of Professional Licensing and the Board of Psychology to address this problem as soon as possible. Two options you might consider are:

- 1) Allow the TLLP to be renewed for a total of at least 4 years (but preferably 6 years), as has been the practice for many years, without requiring students to take the EPPP or accrue a certain number of hours in a specific time window; or
- 2) Create an alternative license specific to doctoral students in psychology training programs, which lasts for at least 4 years and does not require taking the EPPP.

Given the suddenness in the Bureau's enforcement of the TLLP non-renewability policy, and the fact that our doctoral programs and practicum sites will be making decisions in the next few months about next year's training opportunities, we ask that you address this issue promptly.

Sincerely,

Directors of APA-accredited Michigan Doctoral Clinical Psychology Training Programs

Barry Dauphin, Ph.D.  
University of Detroit-Mercy

Scott Gaynor, Ph.D., Amy Naugle, Ph.D.  
Western Michigan University

Frances Brown, Psy.D.  
Michigan School of Professional  
Psychology

Alytia Levendosky, Ph.D.  
Michigan State University

Patricia Deldin, Ph.D.  
University of Michigan

Mark Lumley, Ph.D.  
Wayne State University

Ellen Koch, Ph.D.  
Eastern Michigan University

Reid Skeel, Ph.D.  
Central Michigan University